

December 20, 2021

VIA ECF

The Honorable Sarah J. Netburn
United States Magistrate Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, New York 10007

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In re Terrorist Attacks on Sept. 11, 2001, Case No. 1:03-md-1570-GBD-SN (S.D.N.Y.)

Dear Judge Netburn:

Al Rajhi Bank and Plaintiffs with claims against the Bank write to jointly update the Court on their meet-and-confer discussions, in accordance with the Court's Order at ECF No. 7449.

Counsel for the Bank and for Plaintiffs continue to meet and confer regarding a discovery program for jurisdictional discovery with respect to the Bank. Since the Parties' last joint update to the Court (*see* ECF No. 7445), the Parties have held two additional meet-and-confer calls on December 13 and 20, 2021. The Parties are scheduled to speak again on December 22, 2021. The Parties both believe that progress continues to be made, including with respect to a modified schedule for jurisdictional discovery as to the Bank, but need more time to consider each other's proposals and for the Bank's counsel to confer with their client.

Accordingly, the Bank and Plaintiffs jointly propose that they provide the Court with another update on or before December 23, 2021. Because discovery against the Bank is scheduled to close today (*see* ECF No. 7449), the Parties also jointly request that the Court extend that deadline to December 23, 2021, pending the Parties' joint proposal on a schedule to cover the rest of the jurisdictional discovery process.

Respectfully submitted,

/s/ Nicole Erb

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cc: Counsel of Record (via ECF)